

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 2:22-cr-00097**

**RANDY PRICE**

**SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES  
OF AMERICA TO DEFENDANTS' STANDARD DISCOVERY REQUESTS**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Requests entered by the Court in this case on August 9, 2022, the United States of America, by counsel, herewith supplements its prior response to each of Defendant Randy Price's Standard Discovery Requests as follows:

**Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]**

**Response:** The United States will allow counsel for Defendant to inspect any item of evidence as further listed below deemed appropriate. Counsel should contact AUSA Negar M. Kordestani as soon as possible to arrange a mutually agreeable time to view the evidence, a copy of which was produced via email to defense counsel on September 29, 2022:

Records from/relating to Ohio Adult Parole Authority: PRICE-000210-PRICE-000335

**Request M: Provide notice to defendant of the government's intention to use evidence pursuant to Rule 12(b)(4)(B) of the Federal Rules of Criminal Procedure.**

**Response:** The United States reserves the right to use all information and evidence disclosed herein or made available for inspection and copying pursuant to this Response and such information and evidence which may be discovered and finally provided to defendant.

Any discovery provided that is not mandated by Court order, the Federal Rules of Criminal Procedure, federal statute or federal case law, is provided voluntarily as a matter of discretion solely to expedite and facilitate litigation of this case.

Respectfully submitted,

WILLIAM S. THOMPSON  
United States Attorney

By:

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**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing “SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANTS’ STANDARD DISCOVERY REQUESTS” has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 29th day of September , 2022 upon all counsel of record.

/s/ Negar M. Kordestani  
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